

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Improving Public Safety Communications in the)	
800 MHz Band)	
)	WT Docket No. 02-55
Consolidating the 900 MHz Industrial/Land)	
Transportation and Business Pool Channels)	

To: The Commission

**COMMENTS OF
COMMERCIAL RADIO AND TELEVISION, INC.**

Commercial Radio and Television, Inc., (“Commercial Radio”) operates conventional SMR systems and business radio systems in the Las Vegas area. Commercial Radio also serves a number of other 800 MHz licensees as their radio service shop. As we said in our comments, the cause of the interference can be traced directly to the low-site, digital, cellular-type architecture employed by Nextel. In our comments, we suggested that interference could be solved on a case-by-case basis. That has worked for us to this point.

After reviewing the comments, Commercial Radio now believes that the best long-term solution is to remove Nextel from the 800 MHz band. As we said in our comments, ***“If Nextel were not in the band, there would be no interference problem to public safety systems.”*** Commenters from all segments of the industry raised doubts as to whether rebanding would provide sufficient relief to justify the turmoil that it would

cause. Based on our reading of the comments, most of the experts see little to no advantage to rebanding. We fully concur.

Going beyond the question of whether rebanding will work, the Commission must carefully consider how the rebanding would take place. Even if rebanding were to be viewed as a sufficient solution, if one cannot get there, then it is no solution. Any attempt to retuned the tens of thousands of radios in operation today to new channels would result in massive interference. Even if the frequency coordination issues could be handled, knowing a new frequency to move to does not mean that the former licensee has vacated the channel on the date you retune. Suddenly, existing and retuned licensees are sharing the same channels, with the result being that neither system operates properly.

Moving Nextel to a new band suffers from none of the retuning and transition issues. There are no funding issues for public safety or other 800 MHz licensees. Nextel can move at the pace set by the FCC, presumably in its natural equipment replacement cycle. As Nextel transitions out of 800 MHz, the interference goes away and new 800 MHz spectrum becomes available for public safety, private, or conventional SMR operators. In addition, Nextel gets the clear and contiguous spectrum that it has desired for years.

I trust you will take our concerns into consideration while exploring your options in this Docket.

Sincerely,

Roger Combs
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